

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Jackie M. Sampson

Chapter 13

Debtor

Case No.: 18-16777-MDC\

**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Jackie M. Sampson, by and through his undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about October 11, 2018.
2. The Chapter 13 filing was assigned case number 18-16777-MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about April 11, 2019.
4. The Debtor seeks modification of the plan as the proof of claim submitted by MidFirst Bank does not match the confirmed plan because it was later amended by creditor.
5. On April 8, 2019, MidFirst Bank filed an amended proof of claim, attached hereto as "**Exhibit A**", for arrears in the amount of \$9,659.70.
6. The confirmed plan is incorrect as it lists the amount of arrears to MidFirst Bank in the amount of \$13,103.93 instead of the amended amount of \$9,659.70.
7. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit B**", is deemed affordable by the Debtor.

WHEREFORE, the Debtor requests that he be permitted to modify his  
Chapter 13 Plan for the above-stated reasons.

Dated: September 27, 2019

/s/Brad J. Sadek, Esq  
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